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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

SEP 08 2023

CLERK  
U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

Leila Kasso

Plaintiff(s),

vs.

City of Minneapolis and City of Mineapolis  
Police Department

ERIC HAGLE

Case No. 23-cv-2782 (NEB/DTS)  
(To be assigned by Clerk of District Court)

DEMAND FOR JURY  
TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL plaintiffs  
and defendants in this lawsuit. Please  
attach additional sheets if necessary.)

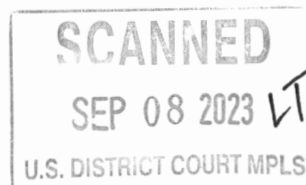
EMPLOYMENT DISCRIMINATION COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name **Leila Kasso**  
Street Address **287 Eagle Ridge Drive**  
County, City **St. Croix County, Roberts**  
State & Zip Code **Wisconsin 54023**  
Telephone Number **(612) 770-1028**



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address

where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name **City of Minneapolis**  
 Street Address **350 S 5th St**  
 County, City **Hennepin County, Minneapolis**  
 State & Zip Code **MN 55415**

b. Defendant No. 2

Name **City of Minneapolis Police Department**  
 Street Address **350 S 5th St**  
 County, City **Hennepin County, Minneapolis**  
 State & Zip Code **MN 55415**

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.c., 2.d., etc.)

JURISDICTION

The Court has jurisdiction over this action under 28 U.S.C. § 1331.

3. This employment discrimination lawsuit is based on (check only those that apply):

- a. ☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et. seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin. **NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission (EEOC).*
- b. ☒ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et. seq.*, for employment discrimination on the basis of age (age 40 or older). **NOTE:** *In*

*order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission (EEOC).*

- c. ☒ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et. seq.*, for employment discrimination on the basis of disability. **NOTE:** *In order to bring suit in federal court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission (EEOC).*
- d. ☒ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et. seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance. **NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office (EEO) representative or agency.*
- e. ☒ Other (Please describe.)

**Defamation of Character, Intentional Infliction of Emotional Distress, Racial Discrimination, Gender Discrimination, Hostile Work Environment, Harassment, Work Retaliation for filing Bona Fide Complaints, Refusal to Provide Reasonable Accommodations per the Americans Disabilities Act of 1990, Refusal to comply with the MN Data Practices Act for evidentiary purposes, Suborning Perjury Under Oath on Interviews, Reports, and Investigations, Perjury, and other violations**

4. If you are claiming that the discriminatory conduct occurred at a location other than the defendant's address above, please provide the following information on where the conduct occurred:

**350 S 5th St Minneapolis, Hennepin County MN 5415 and other locations**

(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

**2011-2023**

#### ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?
- a. ☒ Yes Date filed: 09/01/2019
- b. ☐ No
7. Have you received a Notice of Right-to-Sue Letter?

- a. ☒ Yes      If yes, please attach a copy of the letter to this complaint.
- b. ☐ No

## NATURE OF THE CASE

8. The conduct complained of in this law suit involves (check only those that apply):

- a. ☒ Failure to hire me
- b. ☒ Termination of my employment
- c. ☒ Failure to promote me
- d. ☒ Failure to accommodate my disability
- e. ☒ Terms and conditions of employment differ from those of similar employees
- f. ☒ Retaliation
- g. ☒ Harassment
- h. ☒ Other conduct (please specify):

**Other violations that have yet to be discovered, as the Defendant's have not cooperated with discovery, the MN Data Practices Act, the Defendant's had engaged in Suborning Perjury, Perjury, Hippa Violations, and other violations**

- i. Did you complain about this same conduct in the charge of discrimination, referred to in number 6 above?

☒ Yes    ☐ No

9. I believe that I was discriminated against because of my (check all that apply):

- a. ☒ Race
- b. ☐ Religion
- c. ☐ National origin



d. ☐ Color

e. ☒ Gender

f. ☒ Disability

g. ☒ Age (my birth year is: 1,977.00 )

h. ☒ Other (please specify):

**Disability, Work place Retaliation, Harassment, and other violations of Protected Classes**

i. Did you state the same reason(s) in the charge of discrimination, referred to in number 6 above?

☒ Yes

☐ No

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct (i.e. how, where, and when). Each paragraph must be numbered separately, beginning with number 10. Please write each allegation of discrimination in a separately numbered paragraph.

10.

**The Defendants, The City of Mpls and The City of Mpls Police Department engaged in unlawful collusion with the Minneapolis Police Federation Union to deprive the Plaintiff of her rights under Title 7 of the 1964 Civil Rights Act in Employment Law for Protected Classes to include harassment, failure to reinstate the Plaintiff, failure to Promote the Plaintiff, failure to provide timely Reasonable Accommodations & retaliation.**

**The Defendants retaliated against the Plaintiff as a Whistleblower, for bringing forth timely, legitimate, & bona fide complaints under Oath & under Penalties of Perjury.**

**The Defendants Suborned commit Perjury, & omit details to Minneapolis Civil Rights Division, the MDHR, and the EEOC causing the above listed agencies to issue a right-to-sue, rather than finding probable cause for reported violations under local, state, and Federal law.**

**Failure to abide by the MNDGPA for evidence, harassed the Plaintiff with video and photographic surveillance & further violated HIPPA and medical records violations**

The Defendants engaged in Defamation of Character, and repeatedly made false and misleading statements to the Minneapolis Civil Rights Division, MDHR, and EEOC, on e-mail, Reports, as well as, Internal Affairs Statements. The Defendants failed to represent Plaintiff, & terminated Plaintiff's Health Insurance while suffering disabilities

Supervisors engaged in collusion with the above-listed agencies in an effort to smear the Plaintiff's reputation, cause harm, and delay critical investigations.

The Defendants caused the Intentional Infliction of Emotional Distress, engaged in Defamation of Character, and provided false reports to further humiliate the Plaintiff

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper as Additional Facts and continue to number the paragraphs consecutively.


#### REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

**Order the Defendants to comply and cooperate with: Discovery, Search Warrants, Depositions of Witnesses, MNDGPA Court Orders to include previously requested Body Camera Footage past the 10 day deadline, all documents and reports to include Neuvest and any other relevant Attorney Work Product previously requested by the Plaintiff. All information, Witness Statements to the MDHR, MPLS CIVIL RIGHTS & EEOC Assistance to ensure process servers are accepted, and to assist with unavailable declarants The Plaintiff is seeking other relief as learned through Discovery The Plaintiff is seeking monetary damages to exceed \$75,000.00 and Puntive Damages**

Date:

9-8-2023

  
Signature of Plaintiff

Mailing Address

287 EAGLE RIDGE DR ROBERTS, WI  
54023

Telephone Number

612-770-1028

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

Please see the following Addendum:

Additional Defendant for Defamation of Character, as known at this time, as:

Minneapolis Police Officer Eric Hagle with the Minneapolis Police Department and the City of Minneapolis

350 S 5<sup>th</sup> St

Hennepin County, Minneapolis, MN 55415

Please be advised, the City of Minneapolis was negligent in its representation of me with Investigations, to include with the Federation Representation. The City of Minneapolis had failed to properly Supervise, and commit tortious interference, and Defamation of Character. Additionally, the City of Minneapolis, the City of Minneapolis Police Department, and the Police Officers' Federation of Minneapolis are listed as defendant's through vicarious liability with respect to Employment Discrimination, work place harassment, hostile work environment, and retaliation.

The Plaintiff requests assistance with a Qui Tam Suit as a Whistleblower, otherwise the Plaintiff will proceed with a Jury Trial Pro Se.

The City of Minneapolis is also defendant for a current MNDGPA Court Case, whereby the City of Minneapolis is still refusing to turn over data, e-mails, investigative data, Body Camera Footage, and other information related to all Minneapolis Civil Rights, the MDHR, and the EEOC filings.

Please see the attached listed documents, which further describe the Charging Complaint in Detail from former attorney's tasked and paid to assist in Reinstatement to the City of Minneapolis Police Department involving this current case per the Plaintiff's Right-to-Sue.